

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WELLS FARGO BANK, N.A.,

*Plaintiff,*

v.

COMMENTS SOLUTIONS, LLC  
and  
FIRST LEGACY COMMUNITY  
CREDIT UNION

*Defendants.*

Civil Action No.: 1:19-cv-00077-NLH-KMW

**DECLARATION OF WELLS  
FARGO BANK, N.A.'S COUNSEL,  
ADAM BUSLER ESQ.**

I, ADAM BUSLER, of full age, hereby declare as follows:

1. I am counsel of record in the above-styled action, representing Plaintiff Wells Fargo Bank, N.A (“Wells Fargo”).
2. This Affidavit is based upon my personal knowledge as counsel of record in the case for Wells Fargo and upon my experience as a litigation attorney licensed to practice in New Jersey since 2013.
3. I am an associate at Fox Rothschild LLP (“Fox Rothschild”) and have been an actively practicing attorney since 2013. Seth B. Burack, a partner in Fox Rothschild’s West Palm Beach, Florida office who has worked on this case, has been an actively practicing attorney since 2009. Deneen Ralston, a paralegal at Fox Rothschild who has worked on this case, has been a paralegal since 2013.

4. Fox Rothschild's agreement with Wells Fargo provides that Wells Fargo will pay the Firm for services rendered at a discounted rate. I currently charge the rate of \$400.00 per hour, but agreed to charge Wells Fargo the discounted rate of \$252.00 per hour. Seth B. Burack currently charges the rate of \$370.00 per hour, but agreed to charge Wells Fargo the discounted rate of \$252.00 per hour. Deneen Ralston currently charges the rate of \$215.00 per hour, but agreed to charge Wells Fargo the discounted rate of \$146.00 per hour.

5. I am personally familiar with, and had a direct participatory role in, the work that Fox Rothschild has performed on behalf of Wells Fargo with respect to this Lawsuit. In my capacity as counsel of record in this action, and by virtue of my role at Fox Rothschild, I am also a custodian of records for Fox Rothschild for the case file and records maintained by the firm in this matter. In that capacity, I am familiar with the manner in which its records are created and maintained by virtue of my duties and responsibilities to the firm and with respect to this action.

6. On or about November 29, 2018, Wells Fargo retained Fox Rothschild to represent it in this action, and since the Firm's retention, valuable legal services were performed on behalf of Wells Fargo, including but not limited to reviewing all relevant bank documents; analyzing all legal authority related to this interpleader action; drafting, filing and serving Wells Fargo's complaint for interpleader; securing service of process on Defendant Comment Solutions, LLC ("Comment Solutions")

and Defendant First Legacy Community Credit Union (“First Legacy”); defaulting Comment Solutions; and drafting and filing Wells Fargo’s motion to interplead. Fox Rothschild has also spent additional time communicating with counsel for the First Legacy, as well as Wells Fargo, during the course of Fox Rothschild’s representation.

7. In summary, I, and the other attorneys and paralegals at my firm, over the past approximate one year, have spent approximately 22.1 hours<sup>1</sup> in performing reasonable and necessary legal services in this matter.<sup>2</sup> There also has been approximately \$760.55 in costs incurred, primarily due to filing and service-related fees. Accordingly, based on the attorneys’ and paralegal’s hourly rates, the hours of work expended and the costs incurred to-date, Wells Fargo has incurred and/or will incur a total of approximately **\$6,212.07** as reasonable and necessary attorneys’ fees and costs in this matter.

8. As Wells Fargo’s attorney of record, I am of the opinion that the fees and costs charged by Fox Rothschild are reasonable and necessary to, among other things, protect Wells Fargo as a disinterested stakeholder in a dispute between the Defendants over funds wired from First Legacy to an account held by a Wells Fargo customer (Comment Solutions).

---

<sup>1</sup> Excluding the amount of time expended drafting and filing this Declaration and the Motion for Attorneys’ Fees and Costs to which it is attached.

<sup>2</sup> Attached as Exhibit A are true and correct copies of Fox Rothschild’s invoices to Wells Fargo relative to this action.

9. The Court's review of the services rendered will reveal that there is no invoicing for multiple lawyers or any duplication of services of any nature. The invoices have been redacted to protect the attorney-client privilege and/or information protected by the work-product doctrine. The Court's review of these invoices will reveal that all services were performed seeking to interplead on behalf of Wells Fargo as an innocent and/or disinterested stakeholder.

10. We are confident that the Court's review of each invoice will reveal that the attorneys' fees and costs incurred by Wells Fargo were reasonable, particularly in light of the discounted billing rates Fox Rothschild provided in this action.

11. First Legacy has indicated that it does not object to Wells Fargo's application for fees and costs to be paid from the monies that have been deposited with the Registry of the Court. A true and correct copy of an email from First Legacy's counsel is attached hereto as Exhibit B.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 3, 2020

**FOX ROTHSCHILD LLP**  
Attorneys for Wells Fargo Bank, N.A.

/s/ Adam Busler  
Adam Busler, Esq.

# **EXHIBIT A**



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2285833  
Invoice Date 12/07/18  
Client Number 072979  
Matter Number 00712

RE: COMMENTS SOLUTIONS LLC (NJ)

FOR PROFESSIONAL SERVICES RENDERED THROUGH 11/30/18:

Date	Attorney	Description
11/29/18	RUBIN	EMAIL TO CLIENT REGARDING [REDACTED]
11/30/18	RUBIN	EMAIL CLIENT REGARDING [REDACTED]

ATTORNEY TIME SUMMARY:

Attorney	Hours	Rate	
A.S. RUBIN	0.2	\$416.00	
	TOTAL	0.2	
		CURRENT FEES	\$83.20
		LESS 2.5% DISCOUNT	(\$2.08)
		TOTAL PROFESSIONAL SERVICES	\$81.12
		TOTAL BALANCE DUE UPON RECEIPT	<u>\$81.12</u>



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

## REMITTANCE PAGE

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2285833  
Invoice Date 12/07/18  
Client Number 072979  
Matter Number 00712

RE: COMMENTS SOLUTIONS LLC (NJ)

TOTAL BALANCE DUE UPON RECEIPT

\$81.12

### PAYMENT INSTRUCTIONS

CHECK PAYMENT	ACH PAYMENT	WIRE INSTRUCTIONS
Fox Rothschild LLP Attn: Accounts Receivable - 65 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ACH #031000503 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ABA #121000248 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.



**Fox Rothschild LLP**  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number	2307351
Invoice Date	01/22/19
Client Number	072979
Matter Number	00712
Client Matter ID	WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

**FOR PROFESSIONAL SERVICES RENDERED THROUGH 12/31/18:**

Date	Timekeeper	Description
12/03/18	BURACK	REVIEW OF INITIAL CORRESPONDENCE FROM CLIENT REGARDING [REDACTED].
12/20/18	BURACK	REVIEW OF CASE-FILE (0.5); CORRESPONDENCE TO CUSTOMER RE: [REDACTED] (0.2)
12/21/18	BURACK	REVIEW OF BACKGROUND MATERIALS ON AUTHORIZED SIGNER OF CUSTOMER ACCOUNT RE: ATTEMPTING TO CONTACT HIM FOR DEBIT AUTHORIZATION.
12/21/18	BURACK	DRAFT INTERPLEADER COMPLAINT, INCLUDING COMPREHENSIVE REVIEW OF CITIZENSHIP/BACKGROUND OF WIRE ORIGINATOR, FIRST LEGACY CREDIT UNION.
12/26/18	BURACK	DRAFT CORRESPONDENCE TO CLIENT ENCLOSING DRAFT INTERPLEADER COMPLAINT AND DISCUSSING [REDACTED]
12/26/18	BUSLER	REVIEW DNJ LOCAL RULES RE: INTERPLEADER ACTIONS
12/26/18	BUSLER	REVISE COMPLAINT TO BE IN CONFORMITY WITH LOCAL RULES.

**TIMEKEEPER TIME SUMMARY:**

Timekeeper	Hours	Rate
S. B. BURACK	3.5	\$252.00
A. BUSLER	1.0	\$260.00
<b>TOTAL</b>	<b>4.5</b>	

**TOTAL BALANCE DUE UPON RECEIPT \$1,142.00**



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

## REMITTANCE PAGE

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2307351  
Invoice Date 01/22/19  
Client Number 072979  
Matter Number 00712  
Client Matter ID WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

TOTAL BALANCE DUE UPON RECEIPT

\$1,142.00

### PAYMENT INSTRUCTIONS

CHECK PAYMENT	ACH PAYMENT	WIRE INSTRUCTIONS
Fox Rothschild LLP Attn: Accounts Receivable - 65 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109 ACH #031000503 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109 ABA #121000248 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.



**Fox Rothschild LLP**  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number	2327320
Invoice Date	03/01/19
Client Number	072979
Matter Number	00712
Client Matter ID	WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

**FOR PROFESSIONAL SERVICES RENDERED THROUGH 02/28/19:**

Date	Timekeeper	Description
01/02/19	BURACK	CORRESPONDENCE WITH CLIENT REGARDING [REDACTED] [REDACTED]
01/03/19	BUSLER	COMPLETE COMPLAINT AND EXHIBITS IN FINAL STEP TO FILING OF SAME.
01/03/19	RALSTON	REVIEW ENTITY DOCUMENTS ON BEHALF OF COMMENTS SOLUTIONS LLC AND FIRST LEGACY COMMUNITY CREDIT UNION TO USE FOR COMPLAINT/SERVICE.
01/04/19	BUSLER	DRAFT LETTER TO CLERK RE: ISSUANCE OF SUMMONS
01/14/19	BURACK	CONSIDERATION OF STATUS OF SERVICE ON DEFENDANTS AND POTENTIAL SUBSTITUTED SERVICE ON COMMENTS SOLUTIONS, LLC.
01/18/19	BUSLER	REVIEW AFFIDAVIT OF SERVICE ON FIRST LEGACY
01/24/19	BURACK	CONSIDERATION OF STATUS OF SERVICE ON CLAIMANT DEFENDANTS AND ANTICIPATED SUBSTITUTED SERVICE ON COMMENTS SOLUTIONS, LLC.
01/24/19	BUSLER	PHONE CALL WITH COUNSEL FOR FIRST LEGACY RE: ANSWER TO COMPLAINT
01/28/19	BUSLER	CONDUCT RESEARCH ON SERVICE OF PROCESS ON LLC WHERE REGISTERED AGENT IS NOT LOCATED AT BUSINESS ADDRESS
01/30/19	BUSLER	REVIEW ACCURINT REPORTS ON COMMENT SOLUTIONS AND MICHAEL WILLIAMS

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours	Rate
S. B. BURACK	0.5	\$252.00
A. BUSLER	2.5	\$252.00
D. R. RALSTON	1.0	\$146.00
TOTAL	4.0	
		TOTAL PROFESSIONAL SERVICES \$902.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
STATE FEE	\$6.25
STATE FILING FEES	\$400.00
SUBPOENA SERVICE	\$204.60
TOTAL EXPENSES	<u>\$610.85</u>
TOTAL BALANCE DUE UPON RECEIPT	<u>\$1,512.85</u>



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

## REMITTANCE PAGE

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2327320  
Invoice Date 03/01/19  
Client Number 072979  
Matter Number 00712  
Client Matter ID WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

TOTAL BALANCE DUE UPON RECEIPT

\$1,512.85

### PAYMENT INSTRUCTIONS

CHECK PAYMENT	ACH PAYMENT	WIRE INSTRUCTIONS
Fox Rothschild LLP Attn: Accounts Receivable - 65 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ACH #031000503 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ABA #121000248 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.



**Fox Rothschild LLP**  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number	2336382
Invoice Date	03/07/19
Client Number	072979
Matter Number	00712
Client Matter ID	WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

**FOR PROFESSIONAL SERVICES RENDERED THROUGH 02/28/19:**

Date	Timekeeper	Description
02/05/19	BURACK	CONSIDERATION OF PENDING RESPONSE TO COMPLAINT BY FIRST LEGACY, AS WELL AS SERVICE STATUS ON COMMENTS SOLUTIONS, LLC RE: ANTICIPATED SUBSTITUTED SERVICE THROUGH NJ DEPARTMENT OF REVENUE.
02/21/19	BUSLER	DRAFT DETAILED AFFIDAVIT OF SERVICE RE: EFFORTS TO SERVE COMMENTS SOLUTIONS

**TIMEKEEPER TIME SUMMARY:**

Timekeeper	Hours	Rate
S. B. BURACK	0.1	\$252.00
A. BUSLER	1.2	\$252.00
<b>TOTAL</b>	<b>1.3</b>	

TOTAL AMOUNT OF THIS INVOICE	\$327.60
PRIOR BALANCE DUE	\$1,512.85
<b>TOTAL BALANCE DUE UPON RECEIPT</b>	<b><u>\$1,840.45</u></b>



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

## REMITTANCE PAGE

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2336382  
Invoice Date 03/07/19  
Client Number 072979  
Matter Number 00712  
Client Matter ID WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

TOTAL AMOUNT OF THIS INVOICE	\$327.60
PRIOR BALANCE DUE	\$1,512.85
TOTAL BALANCE DUE UPON RECEIPT	<u>\$1,840.45</u>

### PAYMENT INSTRUCTIONS

CHECK PAYMENT	ACH PAYMENT	WIRE INSTRUCTIONS
Fox Rothschild LLP Attn: Accounts Receivable - 65 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ACH #031000503 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109  ABA #121000248 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.



**Fox Rothschild LLP**  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number	2348270
Invoice Date	04/09/19
Client Number	072979
Matter Number	00712
Client Matter ID	WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

**FOR PROFESSIONAL SERVICES RENDERED THROUGH 03/31/19:**

Date	Timekeeper	Description
03/04/19	BUSLER	ANALYSIS OF ANSWER/CROSSCLAIM/THIRD-PARTY COMPLAINT FILED BY FIRST LEGACY
03/04/19	BUSLER	EMAIL RE: ANSWER/CROSSCLAIM/THIRD-PARTY COMPLAINT FILED BY FIRST LEGACY
03/05/19	BURACK	REVIEW OF COURT'S ORDER REGARDING MARCH JOINT DISCOVERY PLAN DEADLINE AND APRIL CASE MANAGEMENT CONFERENCE, AS WELL AS CONSIDERATION OF STRATEGY GOING FORWARD WITH INTERPLEADER ACTION IN LIGHT OF SAID EVENTS/DEADLINES.
03/06/19	BUSLER	REVIEW COURT'S SCHEDULING ORDER
03/07/19	BURACK	REVIEW OF RESPONSE DEADLINE FOR COMMENTS SOLUTIONS AND CONSIDERATION OF ISSUES/STRATEGY REGARDING DRAFTING MOTION TO INTERPLEAD IN LIGHT OF ABILITY TO DEFAULT COMMENTS SOLUTIONS.
03/07/19	BUSLER	CONSIDERATION OF DEFAULTING COMMENT SOLUTIONS AND JOINT DISCOVERY PLAN
03/13/19	BUSLER	DRAFT APPLICATION FOR DEFAULT AGAINST COMMENT SOLUTIONS
03/15/19	BURACK	CONSIDERATION OF ISSUES/STRATEGY REGARDING NEXT STEPS RE: FILING MOTION TO INTERPLEAD IN LIGHT OF CLERK'S ENTRY OF DEFAULT.
03/15/19	BUSLER	REVIEW ENTRY OF DEFAULT AGAINST COMMENTS SOLUTIONS
03/16/19	BUSLER	BEGIN DRAFTING MOTION TO INTERPLEAD OR IN THE ALTERNATIVE TO DELIVER FUNDS TO FIRST LEGACY
03/22/19	BUSLER	CONSIDERATION OF THIRD-CIRCUIT CASE LAW RE: INTERPLEADER ACTIONS IN CONNECTION WITH DRAFTING SAME.

Date	Timekeeper	Description
03/23/19	BUSLER	COMPLETE DRAFTING/REVISING MOTION TO INTERPLEAD OR IN THE ALTERNATIVE TO DELIVER FUNDS TO FIRST LEGACY
03/26/19	BUSLER	PHONE CALL WITH COUNSEL FOR FIRST LEGACY RE: INTERPLEADER MOTION
03/29/19	BUSLER	PHONE CALL WITH COURT RE: ADJOURNMENT OF SCHEDULING CONFERENCE

**TIMEKEEPER TIME SUMMARY:**

Timekeeper	Hours	Rate	
S. B. BURACK	0.6	\$252.00	
A. BUSLER	7.5	\$252.00	
TOTAL	8.1		
TOTAL PROFESSIONAL SERVICES			\$2,041.20

**COSTS ADVANCED AND EXPENSES INCURRED:**

Description	Amount
SUBPOENA SERVICE	\$149.70
TOTAL EXPENSES	\$149.70
TOTAL BALANCE DUE UPON RECEIPT	<u>\$2,190.90</u>



Fox Rothschild LLP  
ATTORNEYS AT LAW

Phillips Point, 777 South Flagler Drive, Suite 1700 West Tower, West Palm Beach, FL 33401  
Tel 561.835.9600 Fax 561.835.9602 www.foxrothschild.com

TAX I.D. NO. 23-1404723

## REMITTANCE PAGE

WELLS FARGO BANK, N.A.  
BILLING & DOCUMENTATION COORDINATOR  
WACHOVIA CORPORATION  
LEGAL DIVISION (NC-0630)  
301 S. COLLEGE STREET  
CHARLOTTE, NC 28288

Invoice Number 2348270  
Invoice Date 04/09/19  
Client Number 072979  
Matter Number 00712  
Client Matter ID WF2018034987

RE: COMMENTS SOLUTIONS LLC (NJ) WF2018034987

TOTAL BALANCE DUE UPON RECEIPT

\$2,190.90

### PAYMENT INSTRUCTIONS

CHECK PAYMENT	ACH PAYMENT	WIRE INSTRUCTIONS
Fox Rothschild LLP Attn: Accounts Receivable - 65 2000 Market Street, 20th Floor Philadelphia, PA 19103-3222	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109 ACH #031000503 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)	Wells Fargo Bank 123 S. Broad Street Philadelphia, PA 19109 ABA #121000248 Account: Fox Rothschild LLP Account #2100019564260 Swift Code:#WFBIUS6S (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.

# **EXHIBIT B**

**Busler, Adam**

---

**From:** Walt Pettit <Walt.Pettit@hutchenslawfirm.com>  
**Sent:** Thursday, January 23, 2020 6:11 PM  
**To:** Busler, Adam  
**Subject:** [EXT] RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

Adam – I checked with my client and Self-Help now First Legacy does not object to payment of the attorneys' fees incurred by Wells Fargo being paid from the amount deposited with the Clerk. It is my understanding that the total amount of attorneys' fees are around \$7,400.00. Please confirm. Also, we will be serving Wells Fargo with a Request for Production of Documents in the next day or two. My client would like to get a copy of the signature card, drivers license or form of identification used to open the account, a few monthly statements, etc.

Walt Pettit | Managing Partner of Charlotte Office

[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)

Hutchens Law Firm LLP

6230 Fairview Road, Suite 315 | Charlotte, NC 28210

P.O. Box 12497 | Charlotte, NC 28220-2497

T: 704-362-9255 | F: 704-362-9268

[HutchensLawFirm.com](http://HutchensLawFirm.com)



---

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.

PRIVILEGED AND CONFIDENTIAL: This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful, is strictly prohibited, and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone at (910) 864-6888 or by return email, and destroy any copies (electronic, paper or otherwise) that you may have of this communication.

---

**From:** Busler, Adam [mailto:[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)]

**Sent:** Tuesday, January 21, 2020 10:04 AM

**To:** Walt Pettit

**Subject:** RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

\*\*\*CAUTION: This is an external Email from "Busler, Adam" <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)> . Do not click links or open attachments unless you recognize the sender and know the content is safe.\*\*\*

Hi Walt—I'm following up again. I'm hoping to file my application this week and I need to know First Legacy's position. Please let me know at your earliest convenience. Thanks.

Adam Busler  
Associate  
**Fox Rothschild LLP**  
(609) 572-2238 - direct

---

**From:** Walt Pettit <[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)>  
**Sent:** Wednesday, January 15, 2020 2:06 PM  
**To:** Busler, Adam <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)>  
**Subject:** [EXT] RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

Adam – My contact with First Legacy is an in-house counsel who is currently out of town. I will update you as soon as I hear from him.

Walt Pettit | Managing Partner of Charlotte Office  
[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)  
Hutchens Law Firm LLP  
6230 Fairview Road, Suite 315 | Charlotte, NC 28210  
P.O. Box 12497 | Charlotte, NC 28220-2497  
T: 704-362-9255 | F: 704-362-9268  
[HutchensLawFirm.com](http://HutchensLawFirm.com)



---

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.

PRIVILEGED AND CONFIDENTIAL: This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful, is strictly prohibited, and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone at (910) 864-6888 or by return email, and destroy any copies (electronic, paper or otherwise) that you may have of this communication.

---

**From:** Busler, Adam [mailto:[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)]

**Sent:** Wednesday, January 15, 2020 1:47 PM

**To:** Walt Pettit

**Cc:** Denise Carlon ([DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com))

**Subject:** RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

\*\*\*CAUTION: This is an external Email from "**Busler, Adam**" <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)> . Do not click links or open attachments unless you recognize the sender and know the content is safe.\*\*\*

Hi Walt,

I'm checking in regarding First Legacy's position on counsel fees. Please let me know.

**Adam Busler**

Associate

Fox Rothschild LLP

(609) 572-2238 - direct

---

**From:** Walt Pettit <[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)>

**Sent:** Friday, January 10, 2020 4:45 PM

**To:** Busler, Adam <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)>

**Cc:** Denise Carlon ([DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)) <[DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)>

**Subject:** [EXT] RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

Adam – Thanks for the quick responses. I will talk with my client on Monday and let you know if First Legacy's position has changed. I do not believe that it has.

Walt Pettit | Managing Partner of Charlotte Office

[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)

Hutchens Law Firm LLP

6230 Fairview Road, Suite 315 | Charlotte, NC 28210

P.O. Box 12497 | Charlotte, NC 28220-2497

T: 704-362-9255 | F: 704-362-9268

[HutchensLawFirm.com](http://HutchensLawFirm.com)





THIS IS A COMMUNICATION FROM A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.

PRIVILEGED AND CONFIDENTIAL: This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful, is strictly prohibited, and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone at (910) 864-6888 or by return email, and destroy any copies (electronic, paper or otherwise) that you may have of this communication.

---

**From:** Busler, Adam [mailto:[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)]  
**Sent:** Friday, January 10, 2020 4:41 PM  
**To:** Walt Pettit  
**Cc:** Denise Carlon ([DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com))  
**Subject:** RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

\*\*\*CAUTION: This is an external Email from "**Busler, Adam**" <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)> . Do not click links or open attachments unless you recognize the sender and know the content is safe.\*\*\*

Walt—We cannot produce that information without the customer's consent (which I realize is highly unlikely) or a court order. We would not object to your application to the Court for that information. Feel free to give me a call if you want to discuss. Otherwise, kindly advise as to First Legacy's position regarding our attorney fee application at your earliest convenience.

Adam Busler  
Associate  
Fox Rothschild LLP  
(609) 572-2238 - direct

**From:** Busler, Adam <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)>  
**Sent:** Friday, January 10, 2020 9:25 AM  
**To:** Walt Pettit <[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)>

**Cc:** Denise Carlon ([DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)) <[DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)>

**Subject:** RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

Walt—I will need to contact the client to determine what, if anything, they can provide. I will email them now and let you know. I also need to confirm First Legacy's position regarding WF's attorneys' fees application. Your predecessor indicated she had a "tentative yes" from First Legacy regarding our request for \$6,212.07 in fees. I indicated this in my moving papers, but the Court wants to know First Legacy's position on our application. Can you please let me know whether First Legacy consents WF's request for \$6,212.07 in attorney's fees from the restrained proceeds? I need to refile my application with the Court, so a timely answer would be appreciated.

**Adam Busler**

Associate

**Fox Rothschild LLP**

(609) 572-2238 - direct

**From:** Walt Pettit <[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)>

**Sent:** Thursday, January 9, 2020 4:32 PM

**To:** Busler, Adam <[abusler@foxrothschild.com](mailto:abusler@foxrothschild.com)>

**Cc:** Denise Carlon ([DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)) <[DCarlon@kmllawgroup.com](mailto:DCarlon@kmllawgroup.com)>

**Subject:** [EXT] RE: Wells Fargo Bank, N.A. vs. Comments Solutions, LLC and First Legacy Community Credit Union

Adam – We act as counsel for First Legacy in the above matter. With that said, my client is now interested in pursuing its claim against Michael Williams. To that end, please let me know if Wells Fargo is willing to forward a copy of the application to open the deposit account for Comments Soutions, the signature card for the account, the photo identification of the person who opened the account, a copy of the monthly statement(s) which show the deposit and withdrawal based on the wire transfer by my client and any other information which you can give such as whether Michael Williams maintains any accounts at Wells Fargo in his individual name or whether you believe that this is a fictitious name. I will give you a call tomorrow to discuss. Thanks.

Walt Pettit | Managing Partner of Charlotte Office

[Walt.Pettit@hutchenslawfirm.com](mailto:Walt.Pettit@hutchenslawfirm.com)

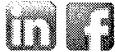
Hutchens Law Firm LLP

6230 Fairview Road, Suite 315 | Charlotte, NC 28210

P.O. Box 12497 | Charlotte, NC 28220-2497

T: 704-362-9255 | F: 704-362-9268

[HutchensLawFirm.com](http://HutchensLawFirm.com)



THIS IS A COMMUNICATION FROM A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT

**A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.**

**PRIVILEGED AND CONFIDENTIAL:** This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful, is strictly prohibited, and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone at (910) 864-6888 or by return email, and destroy any copies (electronic, paper or otherwise) that you may have of this communication.

---

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Fox Rothschild LLP by replying to this email and delete the original and reply emails. Thank you.